

# **EXHIBIT 6**

## Robbie Wright

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**From:** Alex Pierce <APierce@hanszenlaporte.com>  
**Sent:** Monday, April 7, 2025 1:03 PM  
**To:** Bernick, Mike; Huguenard, Harris; Barake, Gabriela; Aaron Wagner; Robbie Wright  
**Cc:** Drab, Michael; Anthony Laporte; Nancy Martinez  
**Subject:** Re: [External] RE: [External] RE: [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits  
**Attachments:** 43780250\_7\_Proposed Text Message Protocol (JW revisions - 2025.03.14).docx

Good morning, Mike,

I spoke with Harris about this on Friday. I'm going to loop in Mr. Ludwig's new counsel. would prefer to use the same Text Message Protocol for all defendants, so that there is continuity.

Aaron, I've attached the most recent version of the Proposed Text Message Protocol; can you please review and let us know your thoughts?

Thanks,  
Alex

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**From:** Bernick, Mike <mbernick@jw.com>  
**Sent:** Saturday, April 5, 2025 11:09:58 AM  
**To:** Huguenard, Harris <hhuguenard@jw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Barake, Gabriela <gbarake@jw.com>  
**Cc:** Drab, Michael <mdrab@jw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>  
**Subject:** [External] RE: [External] RE: [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Hello Alex – we need to get this protocol over the finish line. Can you please let us know your clients' position?

Thank you,  
**Mike Bernick** | Partner  
1401 McKinney, Suite 1900  
Houston, TX 77010  
V: (713) 752-4270 | F: (713) 752-4221 | [mbernick@jw.com](mailto:mbernick@jw.com)

**Jackson Walker LLP**

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**From:** Huguenard, Harris <hhuguenard@jw.com>  
**Sent:** Tuesday, March 25, 2025 11:32 AM  
**To:** Alex Pierce <APierce@hanszenlaporte.com>; Barake, Gabriela <gbarake@jw.com>  
**Cc:** Bernick, Mike <mbernick@jw.com>; Drab, Michael <mdrab@jw.com>; Anthony Laporte <ALaporte@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>  
**Subject:** RE: [External] RE: [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Alex,

To streamline things, we've updated the text message protocol to confirm with what we believe is consistent with your request. Let me know if you have questions. If not, let's get this wrapped up!

Thank you!

Harris J. Huguenard  
1401 McKinney, Suite 1900  
Houston, TX 77010  
(713) 752-4247



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**From:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>

**Sent:** Monday, March 24, 2025 7:04 PM

**To:** Barake, Gabriela <[gbarake@jw.com](mailto:gbarake@jw.com)>

**Cc:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>; Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>

**Subject:** RE: [External] RE: [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

**Caution:** \*\*External Email.

Does tomorrow after 3pm work? I have depositions all days Wednesday.

Thanks,

Alex Pierce  
Hanszen Laporte, LLP  
(713) 522-9444

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**From:** Barake, Gabriela <[gbarake@jw.com](mailto:gbarake@jw.com)>

**Sent:** Friday, March 21, 2025 9:03 AM

**To:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>

**Cc:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>; Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>

**Subject:** [External] RE: [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Sounds good. Pretty open Tuesday or Wednesday. Is any particular time best for you?

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**From:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>

**Sent:** Friday, March 21, 2025 9:01 AM

**To:** Barake, Gabriela <[gbarake@jw.com](mailto:gbarake@jw.com)>

**Cc:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>; Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>

**Subject:** RE: [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

**Caution:** \*\*External Email.

I don't fully understand what the issue is here, as I believe the RFPs are pretty clear. It may be easier to jump on a call to further discuss. What is your availability early next week?

Thanks,

Alex Pierce  
Hanszen Laporte, LLP  
(713) 522-9444

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**From:** Barake, Gabriela <[gbarake@jw.com](mailto:gbarake@jw.com)>  
**Sent:** Thursday, March 20, 2025 8:11 AM  
**To:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>  
**Cc:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>; Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>  
**Subject:** [External] RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Thanks, Alex. In addition to RFP 18, can you please identify which specific RFPs relate to which Empower employees you're seeking information from?

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**From:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>  
**Sent:** Wednesday, March 19, 2025 11:38 AM  
**To:** Barake, Gabriela <[gbarake@jw.com](mailto:gbarake@jw.com)>  
**Cc:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>; Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>  
**Subject:** RE: [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

**Caution:** \*\*External Email.

Good morning, Gabriela,

I hope this finds you well! The most recent discovery served on Empower, also attached here, includes various RFPs seeking communications (inclusive of texts) between Mr. Abrarpour, Mr. Noorian, Empower employee, and other third-parties.

See, for example, Request for Production No. 18: Please produce all communications between Jonathan Abrarpour and any Empower employee, consultant, or advisor or any third-party relating to Matthew Ludwig's employment at Empower from July 1, 2022, to present.

As we are not privy to the internal structure of Empower (and which employee is tasked with certain jobs), we are happy to further discuss our requests, and we can work together to create of employees that would have relevant communications.

Let me know your thoughts!

Thanks,

Alex Pierce  
Hanszen Laporte, LLP  
(713) 522-9444

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**From:** Barake, Gabriela <[gbarake@jw.com](mailto:gbarake@jw.com)>  
**Sent:** Wednesday, March 19, 2025 8:42 AM  
**To:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>  
**Cc:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>; Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>  
**Subject:** [External] RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Good morning,

Following up on the below. Can you please provide the information requested as soon as possible?

Thanks,

**Gabriela M. Barake** | Associate  
1401 McKinney Suite 1900 | Houston, TX | 77010  
V: (713) 752-4427 | F: (713) 752-4221 | [gbarake@jw.com](mailto:gbarake@jw.com)



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**From:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>  
**Sent:** Monday, March 17, 2025 2:34 PM  
**To:** Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>  
**Cc:** Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>  
**Subject:** RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Alex – on the text message protocol, can you please clarify which of your clients’ discovery requests relate to which Empower employees you’re seeking information from?

Thank you,  
**Mike Bernick** | Partner  
1401 McKinney, Suite 1900  
Houston, TX 77010  
V: (713) 752-4270 | F: (713) 752-4221 | [mbernick@jw.com](mailto:mbernick@jw.com)



---

**From:** Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>  
**Sent:** Tuesday, March 11, 2025 2:34 PM  
**To:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>; Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>  
**Cc:** Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>  
**Subject:** RE: Empower/BFS - Proposed Text Message Protocol - HL Edits

Alex,

Thank you for this. We’ll review and get back to you.

I am sorry if I missed it, but were you able to complete your review of the HIG spreadsheet?

Thank you,

Harris J. Huguenard  
1401 McKinney, Suite 1900  
Houston, TX 77010  
(713) 752-4247



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**From:** Alex Pierce <[APierce@hanszenlaporte.com](mailto:APierce@hanszenlaporte.com)>  
**Sent:** Tuesday, March 11, 2025 11:38 AM  
**To:** Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>; Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Drab, Michael <[mdrab@jw.com](mailto:mdrab@jw.com)>  
**Cc:** Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>; Nancy Martinez <[NMartinez@hanszenlaporte.com](mailto:NMartinez@hanszenlaporte.com)>  
**Subject:** Empower/BFS - Proposed Text Message Protocol - HL Edits

**Caution:** \*\*External Email.

Good morning, Mike,

I hope this email finds you well! Please find attached our redlines to the Text Message Protocol. In addition to the edits, we would request that Empower withdraw its subpoena to Apple regarding Matthew Ludwig's devices, as we believe this protocol makes that subpoena extremely duplicative.

Please let me know your thoughts; we are happy to schedule a call to further discuss.

Thanks,  
Alex



**Alexandra Pierce**

Associate  
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